

AMENDMENT GUIDANCE

CONSOLIDATED RESOURCE PLAN

INCLUDING ARRA PROGRAMS

ANNUAL UPDATE

2009-2010

When Not to Amend

When to Amend

An Amendment is an application that modifies the currently approved budget and program narratives when those changes exceed the scope or the allowed flexibility, or changes the bottom line of the currently approved budget and work plan.

Amendment Requests of Approved Applications will be accepted by
RIDE through:

Friday, February 12, 2010

Amendments to Fiscal Year 2010 Consolidated Resource Plan (CRP) and America Recovery and Reinvestment Act (ARRA) Programs

IDEA and Title I Provisions

With the addition of Recovery Funds, districts have a sizeable number of projects underway this year. This includes the added responsibilities of quarterly ARRA reporting. Our staff in the Office for Diverse Learners appreciates the efforts you have made to think through the most productive use of funds on behalf of improving achievement and outcomes for students who benefit from programs supported with IDEA and Title I funds.

This amendment opportunity is available should you need to make essential changes in your IDEA or Title I Part A plans under the CRP or ARRA projects. We realize that, as some of you have indicated, right now you are focused on getting activities underway and meeting the reporting requirement for ARRA funds. We encourage you to submit an amendment to your CRP and ARRA application only if absolutely necessary. Keep in mind that the applications have flexibility built in, and that amending your plan is necessary ONLY if you are moving expenditures within or among series at amounts greater than 10% of your budget total for that funding source, OR if you are making a change that might SIGNIFICANTLY impact your program design. Please refer to Page 4 of this amendment guidance for details on “When Is an Amendment Not Required,” and “When Is an Amendment Required.” (A phone check-in with your assigned district liaison may be helpful, if needed, in determining whether an amendment is absolutely necessary.)

If you are contemplating activity adjustments, but can better make such determinations in May, after activities have been underway for several months, we encourage you to consider using the 2011 applications as the opportunity to make necessary changes in direction.

Thanks for all your hard work on behalf of RI students with special needs who benefit from programs supported with IDEA and Title I funds. Best wishes with your projects this year.

What to Know About IDEA Amendments

There IS one matter that each district identified as having significant disproportionality MUST consider for this amendment period. Federal rules require that any Early Intervening Services funds budgeted as part of the required 15% in a fiscal year, but not fully expended in that fiscal year, MUST be added to the 15%, and expended, in the following fiscal year. In budgeting for the current 2010 fiscal year, several districts have

already addressed the carryover of unspent FY2009 EIS funds by adding this amount to their initial Part B application budgets. A few districts have partially addressed the carryover.

Prior to the amendment period, each special education director was requested via an email communication to work with its Business Office as necessary, to identify any unspent FY2009 EIS reserves and document the amounts. This information will be important in determining whether it's necessary for your district to amend either of its Part B applications to include any FY 2009 unspent funds, if not already included in your initial Part B application for this year.

If you are unsure whether an amendment is necessary for any of your IDEA plans, please consult the Office for Diverse learners liaison assigned to your district.

What to Know About Title I Amendments

Any district that received a waiver of certain calculations of reserves for Choice, Supplemental Educational Services, or Professional Development because of increased ARRA funding must submit an amendment to show the accurate amount of reserves in the approved application for 2009-10.

Typically, a district may request a waiver of the 85% expenditure requirement once every three years. Given the additional Title I funding available under ARRA, US ED has granted RIDE the authority to grant a waiver of the 85% expenditure requirement for 2009-10 even if the district has received a waiver in the past 2 years. Thus, it is not necessary to submit an amendment just to ensure 85% spending.

If you are unsure whether an amendment is necessary for any of your Title I plans, please consult with the liaison assigned to your district.

WHEN IS AN AMENDMENT NOT REQUIRED?

LEAs are advised **not** to file an Amendment to incorporate any balance of unapplied funds unless they expect to spend these funds during the current fiscal year.

Under your RIDE approved CRP and ARRA federal grant budgets, LEAs will not have to file an amendment request for RIDE approval to expend funds if the LEA meets all of the following prerequisites:

- The finalization of allocations resulted in a positive balance of unapplied funds. (i.e. Total Available Balance exceeds Budgeted Amount);
- The cumulative anticipated change(s) within or among objects of expenditure (budget series) does not exceed 10% of your total approved budget for that program or \$100,000.00, whichever amount is less;
- Equipment line items are not increased by more than \$5,000.00;
- All change(s) will not increase the total approved budget;
- There will be no supplanting issues as a result of the change(s);
- All changes are allowable and in compliance with EDGAR, NCLB, and IDEA laws and regulations; and
- The change(s) do not alter the scope, goals, and/or intent of the currently approved program. **See Appendix A for some program examples.**

WHEN IS AN AMENDMENT REQUIRED?

An amendment to a previously approved Consolidated Resource Plan (CRP) is required whenever there is a:

- Change in the total amount of available funds has caused the currently approved budget to exceed the total amount of available funds.
- Change in the Budgeted Bottom Line;
- Cumulative anticipated change(s) within or among Objects of Expenditure (Budget Series) that exceeds 10% of the total approved budget or over \$100,000.00, whichever amount is less;
- Change(s) in Equipment in excess of \$5,000.00;
- Change in the Scope, Goals, and/or Intent of the currently approved program;
- Change in Program Activities and/or Staffing that alters the scope, goals and/or intent of the currently approved program;
- Changes that are required to correct any validation error messages that occur because of changes in allocation amounts; and/or

WHEN IS AN AMENDMENT REQUIRED - CONTINUED:

Keep in mind that any change made to the budgeted total of either of the IDEA programs will also require a proportionate change to the budgeted expenditures for private school services. In addition, as applicable to individual districts, the total amount of funds reserved under Part B for Early Intervening Services (EIS) will require adjustment as the total amount of funds applied for under either of the IDEA programs is changed.

If you are unsure whether an amendment is required, please see Appendix A or contact your RIDE program manager or the RIDE finance officer.

ANY CHANGE THAT IS LATER DETERMINED TO HAVE BEEN NOT ALLOWABLE CAN NOT BE PAID WITH GRANT FUNDS.

WHO DEVELOPS AMENDMENTS?

Consistent with the intent and purposes of consolidation, it is expected that those who participated in the development of the original Consolidated Plan will develop any amendments to the approved CRP.

WHEN WILL AMENDMENTS BE ACCEPTED?

In FY10, amendments of approved CRP and ARRA applications will be accepted for review through February 12, 2010.

Amendment requests will be reviewed only if all required 2009-2010 quarterly financial expenditure reports have been submitted to RIDE.

WHAT IS THE FORMAT FOR AMENDMENTS?

Amendment requests are made through the AcceleGrants on-line application system and must include the following:

- ◆ amended **Program Narrative pages***, if adding or deleting program activities;
and
- ◆ amended **Budget Detail pages** for any proposed expenditure change for each amended program.

FORMAT FOR AMENDMENTS - CONTINUED:

* If any of the application program narrative pages needs to be changed due to the proposed amendment request, please use the following procedure. After the previously approved text, type the word AMENDMENT and then add any information that is new or changed from the previous approved application submission. **DO NOT** delete previously submitted and approved textual information. The text box limit is 5,000 characters. Beyond that, please post a clearly named document into the district document library and instruct the reviewer to see such document in the library.

Please note that the AcceleGrants system tracks changes to the application by placing a delta (small triangle) symbol next to the data/text area that has been amended as compared to the previously approved application. By placing the computer's mouse pointer over the delta symbol, the system will display, for a short time, the previously approved information.

HOW IS AN AMENDMENT REQUEST SUBMITTED?

The work flow and approval path for an amendment is similar to that of the submission of the original application approval request. The approved application is placed into amendment started status in order to amend the previously approved application. An application moved to amendment started status is a copy of the previously approved application which is open for edit. From the AcceleGrants "Funding Applications Page", the system defaults to the amendment started version under the dropdown selection of "All Active Applications". System users can also select either "Last Approved Application" or "All Approved Applications" to view any previously approved application plan(s). Please note that applications are automatically moved to amendment started status when RIDE updates any allocation or carryover figures on an approved application.

System users with the assigned role of "Program and Financial Input" are the only users allowed to make amendment changes to the application document. Once a LEA is satisfied that all necessary amendment changes have been made, the application must be moved to Draft Completed status. The District CRP Coordinator, District Business Manager, and Superintendent then must approve the amendment request, in that order, for the amendment to be submitted to RIDE.

WHEN DO AMENDMENTS GO INTO EFFECT?

Amendment requests are approved only after the proposed application changes have been reviewed and approved by the appropriate program and fiscal staff at RIDE and the application status has been changed to “RIDE CRP Coordinator Final Approved”.

DEFINITIONS:

When using this guidance, the following definitions should be referenced:

Object of Expenditure Code (Budget Series): 51000=Employee Compensation (positions); 52000=Employee Benefits (relating to Personnel); 53000=Professional and Technical Services; 54000=Property Services; 55000=Other Purchased Services; 56000=Supplies and Materials (operating budget); 57000=Property and Equipment; 58000=Miscellaneous (generally for Dues and Fees) and 60000=Indirect Costs.

Personnel/Staffing: FTEs are reported under Budget Series 51000 for Employee Compensation (positions) and 52000 for Employee Benefits; Temporary Services (contractors) are reported under 53000 Professional and Technical Services (Professional and Technical Services). As a reminder, please remember to equally apportion salary and benefits for each staff member.

The Bottom Line: The total program award on the current grant award.

Program Activities: Description of activities included in your program narratives.

Scope: Program activities in the current approved CRP, including narrative and budget justifications in keeping with your program purpose, goals and intent.

Finance Contacts: All CRP Programs

- Antonia Gibbs antonia.gibbs@ride.ri.gov 222-4650
- David Luther david.luther@ride.ri.gov 401-222-4652
- Deborah Marisi deborah.marisi@ride.ri.gov 222-4646

Program Contacts: NCLB – No Child Left Behind Act

Title I – Part A - Targeted Assistance and School-wide Programs

- Colleen Hedden colleen.hedden@ride.ri.gov 222-8939
- Kim Chouinard kim.chouinard@ride.ri.gov 222-8477
- Jan Mermin jan.mermin@ride.ri.gov 222-8954

Title II - Part A – Teacher Quality

- Andre Audette andre.audette@ride.ri.gov 222-5103

Title III – Language Instruction - LEP and Immigrant Children

- Emily Klein emily.klein@ride.ri.gov 222-8985
- Susan Rotblat-Walker susan.walker@ride.ri.gov 222-8413

Title IV – Safe and Drug Free Schools and Communities

- Midge Sabatini margaret.sabatini@ride.ri.gov 222-8952

Title V – Innovative Education

- Andre Audette andre.audette@ride.ri.gov 222-5103

Program Contacts: IDEA – Individuals with Disabilities Education Act

- **Sally Arsenault** sally.arsenault@ride.ri.gov 222-8341
ARRA Part B: Burrillville, Cumberland, East Greenwich, Exeter-West Greenwich, Johnston, Warwick, Lincoln, Chariho, North Providence, North Smithfield, Smithfield, RI School for the Deaf. CRP Part B: Lincoln
- **Emily Klein** emily.klein@ride.ri.gov 222-8985
CRP and ARRA Part B: Central Falls, Pawtucket (w/David Sienko), Providence (w/David Sienko), West Warwick, Woonsocket
- **Phyllis Lynch** phyllis.lynch@ride.ri.gov 222-4693
CRP and ARRA Part B: Barrington, Bristol/Warren, East Providence, Little Compton, Middletown, Newport, Portsmouth, Tiverton, Coventry
- **Melissa MacDonald** melissa.macdonald@ride.ri.gov 222-8349
CRP Part B: Burrillville, Cumberland, Johnston, North Providence, North Smithfield, Smithfield
- **Michele Palermo** michele.palermo@ride.ri.gov 222-8941
CRP IDEA Preschool: All districts
- **David Sienko** david.sienko@ride.ri.gov 222-8987
CRP and ARRA Part B: Cranston, Northwest Region (via Scituate), Pawtucket (w/Emily Klein), Providence (w/Emily Klein), Corrections, Davies, Met Center, RI Training School
- **Ann Turrell** ann.turrell@ride.ri.gov 222-8947
ARRA Preschool: All districts. CRP Part B: Warwick.
- **Susan Wood** susan.wood@ride.ri.gov 222-8992
CRP and ARRA Part B: Charter Schools: Beacon, Blackstone Academy, Compass, Democracy Prep, Highlander, international, Kingston Hill Academy, Learning Community, Paul F. Cuffee, Segue Institute for Learning
- **Alice Woods** alice.woods@ride.ri.gov 222-8983
CRP and ARRA Part B: Chariho, Jamestown, Narragansett, New Shoreham, North Kingstown, South Kingstown, Westerly

This Guidance, Appendix A, Final Allocations and Carryover Balances will be available on or about January 22nd, 2010, at www.ride.ri.gov. Click on “Federal and State Funding” in left column, then click on “FY 2009-2010 CRP Application Materials” in the top middle section.

FY 09-10 CRP AMENDMENT GUIDANCE

APPENDIX A – PROGRAM REQUIREMENTS

The following is a list of possible scenarios that require the district to discuss with the RIDE program contact(s) the changes under consideration to determine whether an amendment is warranted:

Title I – Disadvantaged Youth:

- Addition of a new school (i.e. conducting a TAS program in a **newly participating school**).
- The hiring of **new Title I funded staff members** – teachers and/or paraprofessionals (i.e. hiring a new math teacher).
- Changes the district proposes to make to any **Title I activities** that are substantially different from those described in the 2009-2010 Consolidated Resource Plan (i.e. addition/deletion of a program).
- Changes that are required to correct any validation error messages that occurred because of changes in allocation amounts.
- Changes in required reserves as a result of receipt of a waiver because of increased ARRA funding.

Title II (A) – Teacher Quality:

- Federal Regulations require the Professional Development to be research based. If the method of PD delivery changes, discussion with the RIDE contact is needed.
- Changes the district proposes to make to any **Title II (A) activities** that are substantially different from those described in the 2009-2010 Consolidated Resource Plan (i.e. addition/deletion of a program).
- Federal Regulations require that funds be used to supplement, not supplant state/local funds. If there is an addition of any new positions or an FTE increase for currently approved staff discussion with the RIDE contact is needed.

Amendment Guidance - Appendix A continued:

Title III – Language Acquisition:

- Changes that are substantially different from those described in the 2009-2010 Consolidated Resource Plan would include the addition or deletion of a program activity.

Title IV – Safe & Drug Free Schools:

- Any changes in the use of funds which constitutes a change in program focus or direction must be justified and comply with the Principles of Effectiveness for Title IV. That means there must be a thorough explanation that:
 - A committee representative of the school community met, analyzed objective and reliable data elements and data sources which determined the need for the change in program direction.
 - Performance Measure and Performance Indicators were set to determine the progress which must be made in order to address the priority needs established as a result of the new data analysis.
 - Programs and activities that are based on research and proven effective practices have been selected for implementation which will effectively address the determined needs.
 - An evaluation of the program will be conducted in order to track the progress being made in reducing substance abuse and violent and disruptive behavior in the schools; and discuss how this progress will be publicly reported on a regular basis.

Title V – Innovative Education:

- The Federal Funding period of Title V ended on 9/30/09. Amendments to and expenditures within the Title V program were **not allowable since September 30, 2009.**

Amendment Guidance - Appendix A continued:

IDEA:

- Based on careful audit and documentation of its 2008-2009 EIS expenditures (to be conducted by the Special Education administrator in collaboration with the Business Manager), and determination that any portion of EIS budget items remained unexpended, an amendment is required to add the FY09 EIS balance to the current application.
- Significant changes in staffing that could potentially create compliance issues.
- Changes in Early Intervening Services (EIS) and/or in private school proportionate share. Keep in mind that any change in IDEA budget totals requires proportionate Part B and preschool expenditures for private school services and proportionate Part B expenditures for Early Intervening Services, as applicable to individual districts.